EXHIBIT H

U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 4, 2021

Project Veritas
c/o Paul A. Calli, Esq.
Calli Law, LLC
One Flagler Building, Suite 1100
14 Northeast 1st Avenue
Miami, Florida 33132
pcalli@calli-law.com

      Re: Grand Jury Subpoena

Dear Mr. Calli,

      Please be advised that the accompanying grand jury subpoena has been issued in connection with an official criminal investigation of a suspected felony being conducted by a federal grand jury. The Government hereby requests that you voluntarily refrain from disclosing the existence of the subpoena to any third party. While you are under no obligation to comply with our request, we are requesting you not to make any disclosure in order to preserve the confidentiality of the investigation and because disclosure of the existence of this investigation might interfere with and impede the investigation.

      Thank you for your cooperation in this matter.

                    Very truly yours,

                    DAMIAN WILLIAMS
                    United States Attorney

By: _____

                    Mitzi Steiner
                    Assistant United States Attorney
                    (212) 637-2284

Grand Jury Subpoena

United States District Court
SOUTHERN DISTRICT OF NEW YORK

TO: Project Veritas
       c/o Paul A. Calli, Esq.

GREETINGS:

WE COMMAND YOU that all and singular business and excuses being laid aside, you appear and attend before the GRAND JURY of the people of the United States for the Southern District of New York, at the United States Courthouse, 40 Foley Square, Room 220, in the Borough of Manhattan, City of New York, New York, in the Southern District of New York, at the following date, time and place:

Appearance Date: November 24, 2021   Appearance Time: 10:00 a.m.

to testify and give evidence in regard to alleged violations of:

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18 U.S.C. §§ 2, 3, 4, 371, 2314, 2315

</div>

and not to depart the Grand Jury without leave thereof, or of the United States Attorney, and that you bring with you and produce at the above time and place the following:

<div align="center">

SEE ATTACHED RIDER

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Failure to attend and produce any items hereby demanded will constitute contempt of court and will subject you to civil sanctions and criminal penalties, in addition to other penalties of the Law.

DATED: New York, New York
         November 4, 2021

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

Mitzi Steiner

Assistant United States Attorney
One St. Andrew's Plaza
New York, New York 10007
Telephone: 212-637-2284

RIDER

Grand Jury Subpoena dated November 4, 2021
Reference #2020R01153

Instructions and Definitions:

1. "Documents" refers to any and all documents and records within your possession, custody, or control, in whatever form kept (*e.g.*, paper and electronic form) and wherever they may be found (*e.g.*, on computers, tablets, email accounts, iCloud accounts, servers, personal or company-issued cellphones, and other electronic devices), including, but not limited to, correspondence, writings, emails, text messages, messages sent through "apps" or social media accounts, drawings, graphs, charts, calendar entries, photographs, audio or visual recordings, images, and other data or data compilations.

2. All electronically stored information responsive to this subpoena should be produced in accordance with the "Document and ESI Production Specifications" set forth below.

3. The term "Project Veritas" refers to a corporate entity bearing that name and a corporate entity bearing the name "Project Veritas Action Fund," and includes both entities's officers, directors, employees, or agents.

4. This subpoena does not call for the production of any documents protected by a valid claim of privilege, although any responsive document over which privilege is being asserted must be preserved. Any documents withheld on grounds of privilege must be specifically identified on a privilege log with descriptions sufficient to identify their dates, authors, recipients, and general subject matter.

Materials to be Produced:

1. For the time period of August 1, 2020, through the present, any and all documents relating to any personal property or tangible items provided to Project Veritas by ████████████ ███████████████████

2. For the time period of August 1, 2020, through the present, any and all documents relating to ██, including, but not limited to, communications, draft or executed written agreements, travel records, and financial documents reflecting funds transferred by Project Veritas to any of the aforementioned individuals or their agents.

Document and ESI Production Specifications:

I. Electronically Stored Information (ESI)

a. Electronically stored information (ESI) should be produced in accordance with these specifications. If compliance with these specifications would cause undue burden, please contact the United States Attorney's Office for the Southern District of New York to discuss. Please do not vary from these standards without prior approval.

b. ***All ESI must be produced both in native file format, and in electronically converted TIFF image format including extracted text and load files.***

II. Transactional and Database Records

    a. Transactional records extracted from a database shall be produced in delimited ASCII text data format or in another easily computer-importable non-proprietary file format that does not incur a loss of data. Field headers shall be included for each column of data, and a data dictionary or other explanation of the contents of each column shall be provided.

    b. Images of items associated with transactions, such as checks, shall be produced in graphic data files in a commonly readable, non-proprietary format, such as TIFF or JPEG, with the highest image quality maintained, and named in a manner that uniquely associates them with the relevant transaction record(s).

    c. Where responsive ESI is contained in a complex relational or proprietary database (*e.g.*, Oracle, SAP, SQL, MySQL, QuickBooks) from which records cannot readily be exported without loss of related data, please call the Assistant U.S. Attorney to arrange a meet-and-confer. Identify the database type and version number, and provide the database dictionary and user manuals or other documentation sufficient to describe the structure and content of the database. The meet-and-confer will evaluate, for example, production of a backup of the database (*e.g.*, an .SDF file for a SQL implementation), or other alternatives, such as delimited ASCII exports of custom queries.

III. Native File Format for ESI

    a. All documents must be provided in the original file or "native" format in which the document was created.

    b. System and executable files should not be produced unless specifically requested.

    c. Email files must be delivered in their native format (*e.g.*, Outlook .PST or .msg, Lotus .NSF, etc.).

    d. Relevant information stored in database applications (*e.g.*, Oracle, Sybase, or MSSQL) should only be produced after first consulting with the SDNY attorney to determine method and format of delivery.

    d. Files must be copied and produced in such a manner as to preserve all associated document and file system metadata. See list of required metadata fields below.

    f. Note: a PDF file is *not* considered a native file unless the document was initially created as a PDF.

IV. Electronically Converted TIFF Format for ESI

    a. <u>In addition to the native format</u>, you must also provide an electronically-produced (*i.e.*, not a printed and scanned) TIFF image version, including extracted text and load files, and available metadata, for each document produced in native format.

    b. The electronically converted TIFF production must comply with the TIFF Image Production and Cross Reference File Specifications set forth below.

    c. The electronically converted TIFF production must be provided in a Concordance .dat load,

together with images and the necessary image cross-reference file. *See* the Delivered Fields Specifications below.

V.   Custodian, ESI Source Location, and Path—Naming Conventions

a.   For each document that is produced, the custodian; the ESI source location (*e.g.*, network server, network hard drive, media); and the network or folder path, must be specified in a .dat file.

b.   All ESI provided must be broken down in the following folder structure: by custodian, then by data category (*e.g.*, JohnDoe/Mailfiles/datafiles/desktopfiles).

VI.   Production of Paper Records

a.   Paper records should be produced in ASCII delimited format, as detailed below.

ASCII delimited text file (.dat) format
   i.   The first line of the text file must contain the field names.
   ii.   In most instances, the StartBates should be the Image Key field unless another field has been designated the key field by the Government.
   iii.   The delimiters used should be the default values used by Concordance: comma (ASCII value 20); quote (ASCII value 254); and newline (ASCII value 174).
   iv.   Produce a page header indicator in the following format, <<**batesno**>>, on a separate line for every page of OCR.

b.   If there will be more than one production, please confirm the database fields and structure remain consistent between data deliveries.

VII.   Delivered Fields Specifications

The database and load file provided must contain, at minimum, the first and last Bates number for each document, and all applicable OCR text. The .dat file should contain a path to the OCR. The OCR of the documents should be on a document level.

VIII.   TIFF Image Production and Cross Reference File Specifications

a.   Documents should be electronically converted or, if need be, scanned (at 300 dpi) into single-page CCITT Group IV TIFF files. TIFF file names should match the assigned Bates number of the underlying document page, should be unique, and sequentially numbered. Searchable PDF files will be accepted only after a consultation between the provider and USAO technical support staff. Multi-page TIFF files are strongly discouraged.

b.   Bates numbers should be electronically "endorsed" onto images.   The file name assigned to the image should match the underlying document's Bates number.   Bates numbers should be alpha-numeric, with the numeric portion of the stamp being "zero-filled". As an example, as assigned Bates numbered series of documents such as "ABC1", "ABC2", "ABC3" would be unacceptable, whereas "ABC000001", "ABC000002", "ABC000003" is preferred.

c.   Images should be placed on delivered media in a master folder named **XIMAGES**.

d.   Cross-reference File. TIFF files must be accompanied with an image cross-reference file, preferably an Opticon .opt file, otherwise an IPRO .lfp file will be acceptable. *See* below.

This file must associate each Bates number with the corresponding single-page TIFF file name and indicate its location on the media provided. The file should contain one line for every page in the collection, and must contain the document Bates number and the fully qualified path to the image, beginning with the media volume.

Below is a sample for an Opticon .opt file

```
XYZCO_00663941,,D:\Company\Doe
Production\AUTO0003\XYZCO_00663941.tif,Y,,,1
XYZCO_00663942,,D:\Company\Doe
Production\AUTO0003\XYZCO_00663942.tif,Y,,,1
XYZCO_00663943,,D:\Company\Doe
Production\AUTO0003\XYZCO_00663943.tif,Y,,,2
XYZCO_00663944,,D:\Company\Doe
Production\AUTO0003\XYZCO_00663944.tif,,,,
XYZCO_00663945,,D:\Company\Doe
Production\AUTO0003\XYZCO_00663945.tif,Y,,,1
XYZCO_00663946,,D:\Company\Doe
Production\AUTO0003\XYZCO_00663946.tif,Y,,,2
XYZCO_00663947,,D:\Company\Doe
Production\AUTO0003\XYZCO_00663947.tif,,,,
```

Below is a sample for an IPRO .lfp file:

```
IM,ABC-000001,D,0,@VOL01;IMG_0000001;ABC-000001.tif;2,0
IM,ABC-000002,,0,@VOL01;IMG_0000001;ABC-000002.tif;2,0
IM,3542-S-000001,D,0,@VOL01;IMG_0000001;3542-S-
000001.tif;2,0
IM,3542-S-000002,,0,@VOL01;IMG_0000001;3542-S-
000002.tif;2,0
IM,3542-S-000003,,0,@VOL01;IMG_0000001;3542-S-
000003.tif;2,0
```

IX. Delivery Media

a. All data and image deliveries must be made through a file-sharing site approved by this Office (*i.e.* USAfx), thumb drive, or USB 3.0 external hard drive, depending on data volume.

X. Metadata Fields

The production should include the following metadata fields:
```
Prodbeg
Prodend
Prodbegattach
Prodendattach
From
To
CC
BCC
Subject
```

Date sent
Time Sent
Author
Date Created
Time Created
Date last Modified
Time Last Modified
File Name/Document Name
File Extension
Document Type/Record Type
MD5 Hash
Custodian
Page Count
File Size
Original Folder Path